

Facility Name: **Packaging Corporation of America**

City: Clyattville

County: Lowndes

AIRS #: 04-13-185-00001

Application #: 15946

Date SIP Application Received: January 13, 2005

Date Title V Application Received: January 13, 2005

Permit No: 2631-185-0001-V-01-6

Program	Review Engineers	Review Managers
SSPP	Wendy Troemel	David Matos
SSCP	Sandra Alvarado	Douglas Waldron
ISMP	Sidney Stephens	Richard Taylor/James Capp
TOXICS	Sherry Waldron	Karen Hays

Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft operating permit amendment. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Sections 391-3-1-.03(1) and 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public comment period and EPA review process will be described in an addendum to this narrative.

I. Facility Description

A. Existing Permits

Table 1 below lists the current Title V permit, and all administrative amendments, minor and significant modifications to that permit, and 502(b)(10) attachments. Comments are listed in Table 2 below.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
2631-185-0001-V-01-0	July 16, 2002	X	
2631-185-0001-V-01-1	October 7, 2003	X	
2631-185-0001-V-01-2	February 24, 2004	X	
2631-185-0001-V-01-3	April 21, 2004	X	
2631-185-0001-V-01-4	June 7, 2004	X	
2631-185-0001-V-01-5	March 7, 2005	X	

Table 2: Comments on Specific Permits

Permit Number	Comments
2631-185-0001-V-01-0	Initial Title V Permit
2631-185-0001-V-01-1	Minor modification with construction for addition of a new ESP on Recovery Furnace No. 3, the redesign of the current ESP into a standby unit, and the rebuild of the internals of the ESP on Recovery Furnace No. 2.
2631-185-0001-V-01-2	Minor modification without construction for change of deadline of required performance test for the redesigned ESP for No. 2 Recovery Furnace. Also to correct description of the new ESP for No. 3 Recovery Furnace.
2631-185-0001-V-01-3	Minor modification without construction for the incorporation of site-specific requirements for 40 CFR 63 Subpart MM.
2631-185-0001-V-01-4	Administrative amendment for revisions to the language in Conditions 3.3.29, 4.2.7, 6.1.7, and 6.2.23.
2631-185-0001-V-01-5	Significant modification with construction for the installation of an overfire air (OFA) system and economizer on the Riley Boiler (Source Code: 1005) and an overfire air system on the C.E. Bark Boiler (Source Code: 1006), and the modification of the venturi scrubber (Source Code: C004) servicing both boilers. This permit was processed as a Pollution Control Project under 40 CFR 52.21.

B. Regulatory Status

1. PSD/NSR/RACT

The facility is major for PSD; however this application is the first time the facility has triggered applicability to 40 CFR 52.21. The facility has also taken some limits to avoid PSD applicability in the past. Please refer to the narrative for Title V Permit No. 2631-185-0001-V-01-0 for more details.

2. Title V Major Source Status by Pollutant

Table 3: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the Pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	Yes	✓		
PM ₁₀	Yes	✓		
SO ₂	Yes	✓		
VOC	Yes	✓		
NO _x	Yes	✓		
CO	Yes	✓		
TRS	Yes	✓		
H ₂ S	Yes	✓		
Individual HAP	Yes	✓		
Total HAPs	Yes	✓		

II. Proposed Modification

A. Description of Modification

See Section 1.0 of the Preliminary Determination.

Additionally, the requirements of all existing permit amendments were incorporated into this amendment. See Table 4 below for a list of all conditions contained in each amendment, and where they are now located in the new amendment. Also, an explanation of any change is included.

Table 4: Permit Conditions

2631-185-0001-V-01-6 Amendment Condition Number	Previous Amendment/Initial Permit Condition	Reason Condition was Modified, Deleted, or Added
Amendment 2631-185-0001-V-01-1 dated October 7, 2003		
4.1.3.e (in initial TV)	4.1.3.e	No change - Duplicated requirement from initial Title V
4.1.3.i (in initial TV)	4.1.3.i	No change - Duplicated requirement from initial Title V
4.1.3.q	4.1.3.l	4.1.3.l was already used in initial Title V. Moving the test method to 4.1.3.q allows for all requirements to be fully incorporated
Deleted	4.2.4	Testing completed 4/1/04 and approved by EPD per letter 7/19/04
4.2.5	4.2.5	No change
Deleted	4.2.6	Testing completed 11/03 and approved by EPD per letter 1/22/04 – modified by amendment 2631-185-0001-V-01-2
5.2.3.d.i	5.2.3.d.i	Modified to increase data recording per facility request dated 5/23/05

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6.1.7.c.iv	6.1.7.c.iv	Modified to reflect requested increased monitoring frequency per facility request dated 5/23/05. Also modified to remove redundant "less than" phrases.
6.2.20	6.2.20	No change
Amendment 2631-185-0001-V-01-2 dated February 24, 2004		
Deleted	4.2.6	Testing completed 11/03 and approved by EPD per letter 1/22/04
Amendment 2631-185-0001-V-01-3 dated April 21, 2004		
3.3.2	3.3.2	No change
3.3.28	3.3.28	Modified to correct g/dscf to gr/dscf and to remove "After March 28, 2004"
Deleted	3.3.29	The requirements of this condition are better suited elsewhere and were moved to 6.1.7.b.vii and 6.1.7.b.viii
4.1.3.r – 4.1.3.x	4.1.3.a-e, 4.1.3.q	By numbering these 4.1.3.a-4.1.3.e, it unintentionally revoked the test methods 4.1.3.a-4.1.3.e in the initial Title V permit. This condition fixes that error. 4.1.3.q became 4.1.3.x.
Deleted	4.2.7	Testing completed in June 2004 and approved in July 2004. This condition was modified by later amendment 2631-185-0001-V-01-4.
4.2.8	4.2.8	Modified to remove reference to Condition 4.2.7
4.2.9	4.2.9	No change
4.2.10	4.2.10	No change
4.2.11	4.2.11	No change
5.2.1.b	5.2.1.b	No change
5.2.3.c.i	5.2.3.c.i	No change
5.2.3.c.ii	5.2.3.c.ii	Modified to add the 40 CFR 63 Subpart MM requirements for the monitoring device for this parameter
5.2.3.c.iii	5.2.3.c.iii	No change
Deleted	6.1.7.a.viii	Reporting requirement was moved to Condition 6.1.7.b.viii
Deleted	6.1.7.a.ix	Reporting requirement was moved to Condition 6.1.7.b.vii
6.1.7.b (in initial TV)	6.1.7.b.i	By saying "None" in this amendment, all reporting requirements from 6.1.7.b under the initial Title V Permit were unintentionally revoked. Corrected in later amendment 2631-185-0001-V-01-4.
6.1.7.c.v	6.1.7.c.v	6.1.7.c.v was modified to reflect requested increased monitoring frequency per facility request dated 5/23/05. Also modified to remove redundant "less than" phrases.
6.1.9	6.1.9	No change
6.2.21	6.2.21	Modified to remove the March 13, 2004 date; also modified to specifically refer to each monitoring exceedance for which corrective action needs to be implemented
6.2.22	6.2.22	Modified to reflect more accurate language regarding SSM plans. Still references 40 CFR 63.866(a).
6.2.23	6.2.23	No change – Conditions 6.2.23.c, e, and f were modified under amendment 2631-185-0001-V-01-4
6.2.24	6.2.24	No change
Amendment 2631-185-0001-V-01-4 dated June 7, 2004		
Deleted	3.3.29.c	The requirements of this condition are better suited for Condition 6.1.7.b and were moved to 6.1.7.b.vii and 6.1.7.b.viii
Deleted	4.2.7	Testing completed in June 2004 and approved in July 2004.

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6.1.7.b.i-v (in initial TV)	6.1.7.b.i-v	This corrected an above-mentioned error. However, since this amendment will be revoked, the initial Title V Permit still contains these requirements. No need for duplication.
6.2.23.c, e, and f	6.2.23.c, e, and f	No changes
Amendment 2631-185-0001-V-01-5 dated March 7, 2005		
3.2.2	3.2.2	No change
3.3.30	3.3.30	Modified to reference Application No. 15436 dated June 23, 2004, as opposed to Condition 1.3.
4.1.3.1 (in initial TV)	4.1.3.r	This test method was listed in the initial Title V permit, but was accidentally revoked by amendment 2631-185-0001-V-01-1.
4.2.12	4.2.12	Modified to reference Application No. 15436 dated June 23, 2004, as opposed to Condition 1.3.
4.2.13	4.2.13	No change
4.2.14	4.2.14	No change
4.2.15	4.2.15	No change
5.1.1	5.1.1	No change
5.2.3.a.iv	5.2.3.a.iv	No change
5.2.3.h.i	5.2.3.h.i	No change
Deleted	6.1.7.b.iii - Deleted	No change
6.1.7.b.vi	6.1.7.b.vi	No change
6.1.7.c.ii	6.1.7.c.ii	Modified to reference Application No. 15436 dated June 23, 2004, as opposed to Condition 1.3.
6.1.7.c.iii	6.1.7.c.iii	Modified to reference Application No. 15436 dated June 23, 2004, as opposed to Condition 1.3.
6.1.7.d.vii	6.1.7.d.vii	No change
6.2.25	6.2.25	No change
6.2.26	6.2.26	No change
6.2.27	6.2.27	No change
7.1.1	7.1.1	No change
Deleted	7.1.2	PCA notified EPD of intent to complete stack height increase with letter dated May 17, 2005
Proposed Amendment 2631-185-0001-V-01-6		
2.1.1	N/A	New Condition – to limit the facility-wide paper production rate
3.2.2	3.2.2	Discussed previously
3.3.17	3.3.17	Modified to include specific requirements for the pulp washing system and to correct a reference error
3.3.23	3.3.23	Modified to reference new testing Condition 4.2.18 requiring the facility to retest the NCG Thermal Oxidizer due to the additional gases from the No. 4 Chemiswasher and No. 3 Brown Stock Washer Systems
3.3.28	3.3.28	Discussed previously
Deleted	3.3.29	Discussed previously
3.3.30	3.3.30	Discussed previously
3.3.31	N/A	New Condition - to fully incorporate 40 CFR 63 Subpart S requirements
3.3.32	N/A	New Condition - to fully incorporate 40 CFR 63 Subpart S requirements
3.3.33	N/A	New Condition - to fully incorporate 40 CFR 63 Subpart S requirements
3.3.34	N/A	New Condition – to specify the pulping condensates that can be used in the No. 3A Brown Stock Washer System

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3.3.35	N/A	New Condition – to specify the pulping condensates that can be used in the No. 4 Chemiwasher Washer System
3.4.16.c	N/A	New Condition – to define where the HVLC gases can be incinerated
4.1.3.q, 4.1.3.r-4.1.3.x	Various	Discussed previously
Deleted	4.2.4	Discussed previously
4.2.5	4.2.5	Discussed previously
Deleted	4.2.6	Discussed previously
Deleted	4.2.7	Discussed previously
4.2.8	4.2.8	Discussed previously
4.2.9	4.2.9	Discussed previously
4.2.10	4.2.10	Discussed previously
4.2.11	4.2.11	Discussed previously
4.2.12	4.2.12	Discussed previously
4.2.13	4.2.13	Discussed previously
4.2.14	4.2.14	Discussed previously
4.2.15	4.2.15	Discussed previously
4.2.16	N/A	New Condition – performance testing for No. 3A Brown Stock Washer System
4.2.17	N/A	New Condition – performance testing for SO2 emissions to determine emissions factor for additional vents from No 3A Brown Stock Washer System
4.2.18	N/A	New Condition – performance testing to reestablish the temperature of the thermal oxidizer due to additional gases.
5.1.1	5.1.1	Discussed previously
5.2.1.b	5.2.1.b	Discussed previously
5.2.3.a.iv	5.2.3.a.iv	Discussed previously
5.2.3.b.i	5.2.3.b.i	Modified to increase data recording per facility request dated 5/23/05
5.2.3.b.ii	N/A	New Condition – to require CaO production data per the requirements of 40 CFR 63 Subpart MM
5.2.3.c.i through iii	5.2.3.c.i through iii	Discussed previously
5.2.3.d.i	5.2.3.d.i	Discussed previously
5.2.3.d.v	N/A	New Condition – to require black liquor firing rates per the requirements of 40 CFR 63 Subpart MM
5.2.3.f	5.2.3.f	Modified to increase data recording per facility request dated 5/23/05
5.2.3.h.i	5.2.3.h.i	Discussed previously
5.2.13	N/A	New Condition – to require facility-wide paper production monitoring and recording
6.1.7.a.iii	6.1.7.a.iii	Modified to reference new performance test for Thermal Oxidizer
Deleted	6.1.7.a.viii	Discussed previously
Deleted	6.1.7.a.ix	Discussed previously
Deleted	Deleted (6.1.7.b.iii)	Discussed previously
6.1.7.b.vi	6.1.7.b.vi	Discussed previously
6.1.7.b.vii	N/A	New Condition – monitoring exceedances under 40 CFR 63 Subpart MM
6.1.7.b.viii	N/A	New Condition – monitoring exceedances under 40 CFR 63 Subpart MM
6.1.7.b.ix	N/A	New Condition – exceedance for paper production
6.1.7.c.ii	6.1.7.c.ii	Discussed previously
6.1.7.c.iii	6.1.7.c.iii	Discussed previously
6.1.7.c.iv	6.1.7.c.iv	Discussed previously
6.1.7.c.v	6.1.7.c.v	Discussed previously
6.1.7.c.ix	6.1.7.c.ix	Modified per facility request dated 5/23/05

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6.1.7.c.x	6.1.7.c.x	Modified to reflect requested increased monitoring frequency per facility request dated 5/23/05
6.1.7.c.xiii and xiv	6.1.7.c.xiii and xiv	Modified to reflect requested increased monitoring frequency per facility request dated 5/23/05
6.1.7.d.vii	6.1.7.d.vii	Discussed previously
6.1.7.d.viii and 6.1.7.d.ix	N/A	New Condition – to fully incorporate 40 CFR 63 Subpart MM requirements
6.1.9	6.1.9	Discussed previously
Deleted	6.2.6	Stated deadlines have passed
6.2.20	6.2.20	Discussed previously
6.2.21	6.2.21	Discussed previously
6.2.22	6.2.22	Discussed previously
6.2.23	6.2.23	Discussed previously
6.2.24	6.2.24	Discussed previously
6.2.25	6.2.25	Discussed previously
6.2.26	6.2.26	Discussed previously
6.2.27	6.2.27	Discussed previously
6.2.28	N/A	New Condition – records required under 40 CFR 63 Subpart MM
6.2.29	N/A	New Condition – reporting required under 40 CFR 63 Subpart MM
6.2.30	N/A	New Condition – records of daily paper production
7.1.1	7.1.1	Discussed previously
Deleted	7.1.2	Discussed previously
7.1.3	N/A	New Condition – revokes certain conditions once EPD is notified that the stack height project is completed

B. Emissions Change

See Table 1-1 of the Preliminary Determination.

C. PSD/NSR Applicability

The construction and operation of the No. 3 Brown Stock Washer System and Paper Machine System modifications will be considered a major modification with respect to PSD regulations per Georgia Air Quality Control Regulation 391-3-1-.02(7). A preliminary determination for the No. 3 Brown Stock Washer System and Paper Machine System modifications describes the issues in detail.

III. Facility Wide Requirements

A. Emission and Operating Caps:

The facility has requested, as part of the BACT determination, a facility-wide paper production limit of 547,620 oven-dried tons of paper (equivalent to 575,000 machine-dried tons of paper at 5% moisture), as calculated on a 12-month rolling total. The Paper Machine System modifications will allow the facility to operate the paper machines more efficiently.

B. Applicable Rules and Regulations

There are no new facility-wide applicable rules and regulations associated with this modification.

C. Compliance Status

The facility did not indicate that there are any facility-wide compliance issues in this application.

D. Operational Flexibility

The facility did not request facility-wide operational flexibility in this application.

E. Permit Conditions

New Permit Condition 2.1.1 limits the facility to 547,620 oven-dried tons of paper (equivalent to 575,000 machine-dried tons of paper at 5% moisture), as calculated on a 12-month rolling total. This is a new BACT limit.

IV. Regulated Equipment Requirements

A. Brief Process Description

See Section 1.0 of the Preliminary Determination.

B. Equipment List for the Process

Please note that the equipment table in each amendment was labeled either Table 3.1 or Table 3.1.1, so therefore, each successive amendment effectively superceded the previous equipment table. For example, in amendment 2631-185-0001-V-01-3, the equipment table was named 3.1, which superceded Table 3.1 in the initial Title V Permit. Table 3.1.1 in the proposed amendment is a combination of all equipment affected by the previous five amendments, as well as the equipment affected by this modification.

3.1.1 Modified Emission Units

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements / Standards	Corresponding Permit Conditions	ID No.	Description
40 CFR 63 Subpart MM Site-Specific Requirements					
6063	No. 4 Lime Kiln	40 CFR 60 Subpart BB 40 CFR 63 Subpart MM 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g) 391-3-1-.02(2)(gg)	3.2.1, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.28, 3.4.1 through 3.4.3, 3.4.16, 4.2.1, 4.2.2, 4.2.7 through 4.2.11, 5.2.1, 5.2.3, 5.3.3, 6.1.7, 6.2.15, 6.2.21, 6.2.22, 6.2.23, 6.2.28 through 6.2.31	C009	ESP
7000	No. 1 Recovery Furnace	40 CFR 63 Subpart MM 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g) 391-3-1-.02(2)(gg)1(i)	3.3.2, 3.3.5, 3.3.6, 3.3.28, 3.4.4 through 3.4.7, 4.2.1, 4.2.2, 4.2.7 through 4.2.11, 5.2.1, 5.2.3, 5.3.3, 6.1.7, 6.2.1, 6.2.2, 6.2.9 through 6.2.14, 6.2.21, 6.2.22, 6.2.23, 6.2.28 through 6.2.31	C011	ESP

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Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements / Standards	Corresponding Permit Conditions	ID No.	Description
7010	No. 2 Recovery Furnace	40 CFR 63 Subpart MM 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g) 391-3-1-.02(2)(gg)1(i)	3.3.2, 3.3.28, 3.4.4 through 3.4.7, 4.2.1, 4.2.2, 4.2.7 through 4.2.11, 5.2.1, 5.2.3, 5.3.3, 6.1.7, 6.2.21, 6.2.22, 6.2.23, 6.2.28 through 6.2.31	C013	ESP
7020	No. 3 Recovery Furnace	40 CFR 63 Subpart MM 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g) 391-3-1-.02(2)(gg)1(i)	3.3.2, 3.3.7, 3.3.28, 3.4.4 through 3.4.7, 4.2.1, 4.2.2, 4.2.5, 4.2.7 through 4.2.11, 5.2.1, 5.2.3, 6.1.7, 6.2.21, 6.2.22, 6.2.23, 6.2.28 through 6.2.31	C015-A C015	Primary ESP Standby ESP
7005	No. 1 Smelt Dissolving Tank	40 CFR 63 Subpart MM 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(gg)1(iii)	3.3.2, 3.3.28, 3.4.8 through 3.4.10, 4.2.1, 4.2.2, 4.2.7 through 4.2.11, 5.2.3, 6.1.7, 6.2.21, 6.2.22, 6.2.23, 6.2.28 through 6.2.31	C012	Dynamic Scrubber
7015	No. 2 Smelt Dissolving Tank	40 CFR 63 Subpart MM 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(gg)1(iii)	3.3.2, 3.3.28, 3.4.8 through 3.4.10, 4.2.1, 4.2.2, 4.2.7 through 4.2.11, 5.2.3, 6.1.7, 6.2.21, 6.2.22, 6.2.23, 6.2.28 through 6.2.31	C014	Dynamic Scrubber
7025	No. 3 Smelt Dissolving Tank	40 CFR 63 Subpart MM 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(gg)1(iii)	3.3.2, 3.3.28, 3.4.8 through 3.4.10, 4.2.1, 4.2.2, 4.2.7 through 4.2.11, 5.2.3, 6.1.7, 6.2.21, 6.2.22, 6.2.23, 6.2.28 through 6.2.31	C016	Dynamic Scrubber
Overfire Air Project					
1005	Riley Combination Boiler	391-3-1-.02(2)(b) 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	3.2.1, 3.3.30, 3.4.11, 3.4.16, 4.2.1, 4.2.12, 4.2.13, 4.2.14, 4.2.15, 5.2.2, 5.2.3, 5.2.13, 5.2.14, 5.3.3, 6.1.7, 6.2.2	C003 C004	Cyclone Separator Venturi Scrubber
1006	C.E. Combination Boiler	391-3-1-.02(2)(b) 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	3.2.1, 3.3.30, 3.4.11, 3.4.16, 4.2.1, 4.2.12, 4.2.13, 4.2.14, 4.2.15, 5.2.2, 5.2.3, 5.2.13, 5.2.15, 5.3.3, 6.1.7, 6.2.2	C005 C004	Cyclone Separator Venturi Scrubber
1017	C.E. Power Boiler	391-3-1-.02(2)(b) 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	3.2.2, 3.4.11 through 3.4.13, 4.2.1, 4.2.2, 5.2.3, 5.3.3, 6.1.7, 6.2.25, 6.2.26, 6.2.27, 7.1.1, 7.1.3	None	
No. 3 Brown Stock Washer and Paper Machine Systems Modifications					
G016	No. 3A Brown Stock Washer System (including No. 3A drum washer and associated tanks)	40 CFR 52.21 40 CFR 63 Subpart S ^w	3.3.2, 3.3.17 through 3.3.23, 3.3.25, 3.3.27, 3.3.31 through 3.3.34, 3.4.16, 4.2.16, 4.2.17, 4.2.18, 6.1.7	1005, 1006, 6076 ^w	Thermal oxidation followed by an alkaline scrubber
G014	Paper Machine System	40 CFR 52.21	2.1.1, 5.2.13, 6.1.7, 6.2.32	None	
G039	No. 4 Chemiwasher System (including associated tanks)	40 CFR 60 Subpart BB 40 CFR 63 Subpart S ^w	3.3.1, 3.3.2, 3.3.17 through 3.3.23, 3.3.31 through 3.3.33, 3.3.35	1005, 1006, 6076	Thermal oxidation followed by an alkaline scrubber

- Generally applicable requirements contained in this permit may also apply to emission units listed above.

- ψ All existing permit conditions that incorporate applicable provisions of 40 CFR 63 Subpart S systems and that apply to the existing HVLC systems also apply to the No. 3A Brown Stock Washer System as of April 17, 2006. These already apply to the No. 4 Chemiwasher system.

C. Equipment & Rule Applicability

See Section 3.0 of the Preliminary Determination.

Additionally, the requirements of 40 CFR 63 Subpart MM were reviewed to ensure the facility is properly permitted for all applicable requirements. It was noted that, since this facility was the first facility permitted with site-specific 40 CFR 63 Subpart MM requirements, a few conditions were erroneous or missing. These conditions were corrected and added to the Permit. Some additional 40 CFR 63 Subpart S requirements were also added to ensure the facility is properly permitted for all applicable requirements.

D. Compliance Status

The facility did not indicate that there are any facility-wide compliance issues in this application.

E. Operational Flexibility

The facility did not request facility-wide operational flexibility in this application.

F. Permit Conditions

All Permit Conditions from Section 3 in Amendment Nos. 2631-185-0001-V-01-1 through 2631-185-0001-V-01-5 were incorporated into Section 3 of this Amendment. Only modified or new conditions are addressed below.

Permit Condition 3.3.17 was modified to incorporate specific requirements for the pulp washing systems. Also, it was corrected to reference 40 CFR 63.443, not 40 CFR 63.442.

Permit Condition 3.3.23 was modified to reference a new performance test that the facility must conduct once the additional gases from the No. 3A Brown Stock Washer System are added to the NCG Thermal Oxidizer's load.

Permit Condition 3.3.28 was modified to correct the units of gr/dscf.

Permit Condition 3.3.29 was deleted from the Permit. The requirements for this condition are now contained in Permit Conditions 6.1.7.b.vii and 6.1.7.b.viii.

New Permit Conditions 3.3.31 through 3.3.33 were added to fully detail the 40 CFR 63 Subpart S requirements for both LVHC and HVLC streams.

New Permit Conditions 3.3.34 and 3.3.35 were added to specify the pulping condensates that can be used in the No. 3A Brown Stock Washer System and the No. 4 Chemiwasher System, respectively. The use of different shower waters minimizes VOC emissions from the Paper Machine System.

Permit Condition 3.4.16 was modified to allow the HVLC gases from the No. 3 Brown Stock Washer System to be incinerated in either of the combination boilers or the NCG Thermal Oxidizer.

V. Testing Requirements (with Associated Record Keeping and Reporting)

A. Individual Equipment: See Section 5.0 of the Preliminary Determination.

All Permit Conditions from Section 4 in Amendment Nos. 2631-185-0001-V-01-1 through 2631-185-0001-V-01-5 were incorporated into Section 4 of this Amendment. Only modified or new conditions are addressed below.

Permit Condition 4.1.3 was modified to correctly reflect the listed test methods. Previous amendments had erroneously revoked test methods from the initial Title V Permit or duplicated listed test methods.

Permit Conditions 4.2.4 and 4.2.6 were removed from the Permit. The testing required by these conditions was completed on 4/1/04 and 11/19/03, respectively, and approved by EPD on 7/19/04 and 1/22/04, respectively.

Permit Condition 4.2.7 was removed from the Permit. The testing required by this condition was completed in June 2004 and approved by EPD in July 2004.

Permit Condition 4.2.8 was modified to remove reference to Permit Condition 4.2.7. Instead, it references 40 CFR 63.865, which describes the initial performances testing required by 40 CFR 63 Subpart MM.

Permit Condition 4.2.12 was modified to reference Application No. 15436 dated June 23, 2004, as opposed to Condition 1.3, which does not exist in this amendment.

New Permit Condition 4.2.16 was added to detail the performance testing requirements for the modified No. 3A Brown Stock Washer System.

New Permit Condition 4.2.17 requires the facility to test the SO₂ emissions from the Riley and C.E. Combination Boiler stack in order to determine an emission factor for the emissions from the addition of the vent gases from the No. 3A Brown Stock Washer System.

New Permit Condition 4.2.18 requires the facility to retest the NCG Thermal Oxidizer once the gases from the No. 3A Brown Stock Washer System are added to the vents. This is to prove compliance with the requirements of 40 CFR 63 Subpart S and establish/verify the temperature limit in Condition 3.3.23.

VI. Monitoring Requirements (with Associated Record Keeping and Reporting)

A. Individual Equipment: See Section 5.0 of the Preliminary Determination

All Permit Conditions from Section 5 in Amendment Nos. 2631-185-0001-V-01-1 through 2631-185-0001-V-01-5 were incorporated into Section 5 of this Amendment. Only modified or new conditions are addressed below.

Per a facility request dated May 23, 2005, Permit Condition 5.2.3.b.i was modified to increase the data recording from once per shift to once per hour for the Lime Kiln ESP. The facility will also calculate the total power from the ESP once every 2 hours instead of once per shift.

New Permit Condition 5.2.3.b.ii was added to require the facility to monitor CaO production rate from the Lime Kiln daily. This a 40 CFR 63 Subpart MM requirement that was not included in a previous amendment.

Permit Condition 5.2.3.c.ii was modified to fully incorporate the applicable requirements of 40 CFR 63 Subpart MM. This defines the accuracy of the flow rate meter for scrubber make-up flow rate for the Smelt Dissolving Tank scrubbers.

Per a facility request dated May 23, 2005, Permit Condition 5.2.3.d.i was modified to increase the data recording from once per shift to once per hour for the Recovery Furnace ESPs. The facility will also calculate the total power from the ESPs once every 2 hours instead of once per shift.

New Permit Condition 5.2.3.d.v was added to require the facility to monitor black liquor solids firing rate from the Recovery Furnaces daily. This a 40 CFR 63 Subpart MM requirement that was not included in a previous amendment.

Per a facility request dated May 23, 2005, Permit Condition 5.2.3.f was modified to increase the data recording from once per shift to once per hour for the Lime Slaker Dust Suppression system. The phrase “within 180 days of issuance of this permit” was also removed from the condition.

New Permit Condition 5.2.13 was added to require the facility to monitor facility-wide daily paper production.

VII. Other Record Keeping and Reporting Requirements

All Permit Conditions from Section 6 of Amendment Nos. 2631-185-0001-V-01-1 through 2631-185-0001-V-01-5 were incorporated into Section 6 of this Amendment. Only modified or new conditions are addressed below.

Permit Condition 6.1.7.a.iii was modified to reference both the current temperature of 1229°F and the temperature established in Permit Condition 4.2.18.

Permit Conditions 6.1.7.a.viii and 6.1.7.a.ix were deleted from the Permit. The requirements for these conditions are now contained in Permit Condition 6.1.7.b.vii.

New Permit Condition 6.1.7.b.vii outlines the monitoring exceedances for the Recovery Furnaces and Lime Kiln. This condition properly outlines the 40 CFR 63 Subpart MM requirements.

New Permit Condition 6.1.7.b.viii outlines the monitoring exceedances for the Smelt Dissolving Tank scrubbers. This condition properly outlines the 40 CFR 63 Subpart MM requirements.

New Permit Condition 6.1.7.b.ix was added to require the facility to report any consecutive twelve-month period during which the facility produces more than 547,620 oven-dried tons of paper (equivalent to 575,000 machine-dried tons of paper at 5% moisture).

Permit Condition 6.1.7.c.ii and 6.1.7.c.iii were modified to reference Application No. 15436 dated June 23, 2004, as opposed to Condition 1.3, which does not exist.

Per a facility request dated May 23, 2005, Permit Condition 6.1.7.c.iv was modified to change the reporting frequency from any instance to any four consecutive hour for power from the Recovery Furnace ESPs. Also, since the testing required by Permit Conditions 4.2.4 and 4.2.6 was completed, the actual values were included in the condition.

Permit Conditions 6.1.7.c.iv and 6.1.7.c.v were modified to remove redundant “less than” phrases.

Permit Condition 6.1.7.c.ix was modified to remove the word “Chemiwasher” per a facility request dated May 23, 2005.

Per a facility request dated May 23, 2005, Permit Condition 6.1.7.c.x was modified to change the reporting frequency from any instance to any four consecutive hours for power from the Lime Kiln ESP.

Per facility request dated May 23, 2005, Permit Conditions 6.1.7.c.xiii and 6.1.7.c.xiv was modified to change the reporting frequency from any instance to any four consecutive hours for water flow and water pressure from the Lime Slake Dust Suppression system.

New Permit Conditions 6.1.7.d.viii and 6.1.7.d.ix were added to fully incorporate the requirements of 40 CFR 63 Subpart MM.

Permit Condition 6.2.6 was deleted since the submission dates have passed and the facility has complied with the reporting requirements.

Permit Condition 6.2.21 was modified to remove “After March 13, 2004” since that date has passed. Also, the individual monitoring exceedances were detailed in order to be more complete.

Permit Condition 6.2.22 was replaced in its entirety to fully detail the requirements for startup, shutdown, and malfunction plans per the requirements of 40 CFR 63 Subpart S and MM.

New Permit Condition 6.2.28 was added to require the facility to maintain records of monitoring exceedances per the requirements of 40 CFR 63 Subpart MM.

New Permit Condition 6.2.29 was added to fully detail the excess emissions/violation reporting per the requirements of 40 CFR 63 Subpart MM.

New Permit Condition 6.2.30 was added to require the facility to record facility-wide daily paper production.

VIII. Specific Requirements

A. Operational Flexibility

Permit Condition 7.1.2 was deleted since the facility notified the Division in a May 17, 2004 letter that the increase in stack height project will be completed.

New Permit Condition 7.1.3 states that, upon notification to the Division that the increase in stack height project is completed, the requirements of Permit Conditions 3.2.2, 5.2.3.h.i, 6.1.7.d.vii, 6.2.25, 6.2.26, 6.2.27, and 7.1.1 become null and void.

B. Alternative Requirements – Not Applicable

C. Insignificant Activities – Not Applicable

D. Temporary Sources – Not Applicable

E. Short-Term Activities – Not Applicable

F. Compliance Schedule/Progress Reports – Not Applicable

G. Emissions Trading – Not Applicable

H. Acid Rain Requirements – Not Applicable

I. Prevention of Accidental Releases – Not Applicable

J. Stratospheric Ozone Protection Requirements – Not Applicable

K. Pollution Prevention – Not Applicable

L. Specific Conditions – Not Applicable

Addendum to Narrative

EPD issued draft amendment 2631-185-0001-V-01-6 to Title V Permit 2631-185-0001-V-01-0 to Packaging Corporation of America (PCA) in Clyattville, Georgia on June 28, 2005. The public notice for this permit was published in *The Valdosta Daily Times* on July 8, 2005. The public comment period expired August 8, 2005. Comments were received from PCA on August 5, 2005 and from U.S. EPA on July 22, 2005. No comments were received from the public. The comments are summarized below followed by a discussion of each comment and any changes made to the permit as a result.

Comments received from Packaging Corporation of America dated August, 5, 2005

Comment 1: Continuous Monitoring Systems (CMS) requirements for the black liquor firing rate and the calcium oxide production rate

PCA states that the requirement in Condition 5.2.3.b.ii and 5.2.3.d.v requires a CMS for the calcium oxide production rate for the No.4 Lime Kiln and the black liquor solids firing rate for the Nos. 1, 2, and 3 Recovery Furnaces, respectively. PCA states that 40 CFR 63 Subpart MM does not require continuous monitoring of these parameters, only daily recordkeeping. PCA requested that conditions 5.2.3.b.ii and 5.2.3.d.v be removed from the permit amendment.

EPD Response:

EPD agrees with PCA and draft Conditions 5.2.3.b.ii and 5.2.3.d.v. were removed from the final permit. The recordkeeping requirements are in the permit as Condition 6.2.23.b for lime production from the No. 4 Lime Kiln and Condition 6.2.23.a for black liquor firing rate in the Nos. 1, 2, and 3 Recovery Furnaces. No other changes were made to the permit due to this comment.

Comment 2: Establishing the Minimum Operating Temperature in the NCG Thermal Oxidizer (Source Code 6077)

PCA requested a slight wording change to set the minimum operating temperature for the NCG thermal oxidizer because the current language is not indicative of the typical operation of the thermal oxidizer. The most common operation of the thermal oxidizer is with the HVLC gases combusted in the powerhouse and only the LVHC and stripper off gases (SOG) in the incinerator. Rather than potentially raise the minimum temperature all the time, including the most common operating scenario, which is unaffected by the addition of more HVLC gases from 3A washer, PCA proposed the following wording change:

Condition 3.3.23 “...or above the temperature established in Condition 4.2.18 for the additional gases from the No. 4 Chemiwasher System (Source Code: G039) and No. 3A Brown Stock Washer System (Source Code: G016), ~~whichever is greater~~ **whenever burning HVLC gases**, or shall combust ...”

EPD Response:

The Division agrees with the facility and the appropriate changes were made to the permit. To notify the Division when the HVLC gases are combusted in Thermal Oxidizer (Source Code 6076), Condition 6.2.2 was split into two sections 6.2.2.a and 6.2.2.b. Condition 6.2.2.a contains the old Condition 6.2.2 language, and Condition 6.2.2.b requires the facility to keep the hours of operation when the thermal oxidizer is being used as the control device for the No. 4 Chemiwasher System (Source Code: G039) and No. 3A Brown Stock Washer System (Source Code: G016).

Comment 3: Language Clarification in Condition 6.2.23.c

PCA requested that the phrase "...any period..." be used in Condition 6.2.23.c instead of the phrase "...any time...". The regulatory language reference the applicable averaging periods and of the monitored parameters, while the proposed limit could be interpreted to be a much shorter time.

EPD Response:

EPD agrees with PCA and the appropriate changes were made to Condition 6.2.23.c.

Comments received from U.S. EPA on July 22, 2005

Comment 1: No. 3 Brown Stock Washer BACT Analysis

The No. 3 Brown Stock Washer was evaluated as part of the BACT determination for VOC and TRS emissions, even though both the application and the preliminary determination state that the washer will decrease in emissions. A BACT assessment is not required for emissions units unless the unit is anticipating an increase in emissions of pollutants subject to BACT.

EPD Response:

EPD agrees that the BACT analysis was not necessary for the No. 3 Brown Stock Washer due to the decrease in emissions from this unit. No changes were made to the permit due to this comment.

Comment 2: Contemporaneous Period

The application and the preliminary determination define the contemporaneous period for the netting analysis to be the period of commencement of construction (October 2005) to the date five years prior to commencement (October 2000). EPA also mentions that the contemporaneous period also extends to the date that the increase in emissions from the changes occurs.

EPD Response:

EPD agrees that the contemporaneous period is the period of time from the commencement of construction (October 2005) back five years (October 2000) plus the period of time until the increase in emission occurs.

Comment 3: Ozone Preconstruction Monitoring

Due to the proposed increase in VOC emissions exceeding 100 tons per year, the preliminary determination should address the ozone preconstruction monitoring.

EPD Response:

Emissions of VOC from the proposed Brownstock Washer project are estimated to be 142.5 tons per year and include emissions from contemporaneous projects. As part of the PSD permit application (Section 7.6.2.4), a semi-quantitative assessment of the impact that VOC emissions would have on ozone levels surrounding the Valdosta Mill was conducted. The semi-quantitative analysis incorporated the approach developed by Mr. Richard Scheffe for U.S. EPA's Office of Air Quality Planning and Standards (OAQPS) Source Receptor Analysis Branch in September 1988. The Scheffe analysis indicated that very low levels of ozone (less than 15% of the 1-hour standard) could be expected due to the project related VOC emissions. Based on the Scheffe analysis, the Valdosta Mill believes that ozone ambient air monitoring is not warranted.

To provide additional support to the position that ambient air ozone monitoring is not necessary, the Valdosta Mill reviewed the existing ambient air ozone monitoring network for the region. It was determined that there are four ambient ozone monitoring sites located within distances between 87 and 104 kilometers (54 and 65 miles) of the Valdosta Mill. The four monitoring sites are located to the southeast and southwest of the Mill in three Florida counties and, based on a review of the local wind patterns, are collectively downwind of the Mill 46.5% of the time (based on the 1982-1986 wind distribution data for Tallahassee, Florida). The ozone monitoring data from the four sites show that the region is in attainment with the 8-hour ozone standard as well as the former 1-hour standard. Based on the proximity of the ozone monitoring sites to the Mill, the regional nature of ozone (i.e., the emission of ozone precursors react to form ozone downwind of the emission point), and the fact that acceptable levels of ozone are present, it does not appear that conducting an additional ambient air ozone monitoring program in the area as part of the Brownstock Washer project is necessary or warranted.